IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

Vanida Khautisen, as Personal Representative of the Estate of Khouanexay Bill Sivilay,

C/A No. 7:21-3775-TMC

Plaintiff,

v.

BHG Holdings, LLC, and BHG XXXVIII, LLC,

Defendants.

PLAINTIFF'S RULE 26(a)(2) EXPERT DISCLOSURES AND CERTIFICATION

Pursuant to Federal Rule of Civil Procedure Rule 26(a)(2), Plaintiff identifies the following expert witnesses:

 David H. Eagerton, Ph.D., F-ABFT 1855 E. Main Street, Suite 14 #112 Spartanburg, SC 29307

Counsel for Plaintiff certifies that a copy of the expert report of David H. Eagerton, Ph.D. and all information required by Rule 26(a)(2)(B) has been served upon counsel for the parties and sets forth the expert opinions of Dr. Eagerton based upon available information.

Nathan R. Strahl, M.D., Ph.D.
 3326 Durham-Chapel Hill Blvd., Suite B-110
 Durham, NC 27707

Counsel for Plaintiff certifies that a copy of the expert report of Nathan R. Strahl, M.D., Ph.D. and all information required by Rule 26(a)(2)(B) has been served upon counsel for the parties and sets forth the expert opinions of Dr. Eagerton based upon available information.

The experts reserve the right to amend and/or supplement their respective reports to the extent permitted by Rule 26 of the Federal Rules of Civil Procedure.

Plaintiff expressly reserves the right to call as an expert any expert witness identified by the Defendants.

Respectfully submitted,

s/Phillip D. Barber
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ATTORNEYS FOR PLAINTFF

August 12, 2022 Columbia, South Carolina.